

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

PRESIDENT DONALD J. TRUMP,
an individual,

Plaintiff,

v.

CBS BROADCASTING INC., a
New York corporation and CBS
INTERACTIVE INC., a Delaware Corporation

Defendants.

Case No.: 2:24-CV-00236-Z

JURY TRIAL DEMANDED

**CONSENT MOTION FOR LEAVE TO RESPOND TO DEFENDANTS’
MOTION TO DISMISS FOR LACK OF PERSONAL
JURISDICTION AND IMPROPER VENUE OR, IN THE ALTERNATIVE,
TO TRANSFER AND DEFENDANTS’ MOTION TO DISMISS
THE COMPLAINT FOR LACK OF SUBJECT MATTER JURISDICTION AND
FAILURE TO STATE A CLAIM**

Defendants CBS Broadcasting Inc. and CBS Interactive Inc. have filed (1) a “Motion to Dismiss for Lack of Personal Jurisdiction and Improper Venue or, In the Alternative, to Transfer,” and (2) a “Motion to Dismiss the Complaint for Lack of Subject Matter, Jurisdiction and Failure to State a Claim” (the “Motions”).

Plaintiff respectfully requests, per agreement of the Parties, (1) that the Court extend Plaintiff’s deadline to file an Amended Complaint in response to the Motions, until January 17, 2025, and (2) in the alternative, if Plaintiff files opposition to the Motions instead of filing an Amended Complaint in response to the Motions, that the Court extend Plaintiff’s deadline to file opposition to the Motions until January 17, 2025.

The Parties have further agreed that, (3) if Plaintiff files an Amended Complaint in response to the Motions, Defendants will have until February 14, 2025 to file any responsive pleadings or renewed motions, and (4) in the alternative, if Plaintiff files opposition(s) to the Motions instead of filing an Amended Complaint in response to the Motions, Defendants will have until February 14, 2025 to file any reply papers.

Plaintiff's counsel has conferred with counsel for Defendants, and all parties have consented to this motion in writing.

Respectfully submitted,

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/s/ Chris D. Parker

Chris D. Parker

CERTIFICATE OF CONFERENCE

I certify that on the 13th day of December, 2023 I conferred with attorney Elizabeth McNamera, counsel for Defendants. Ms. McNamera stated that she is in agreement with this Motion.

/s/ Edward Paltzik

Edward Paltzik

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was served pursuant to the Federal Rules of Civil Procedure on the 16th day of December, 2024, via the Northern District's electronic filing notification system.

/s/ Chris D. Parker

Chris D. Parker